

February 6, 2006

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BY ELECTRONIC COMMENT FILING SYSTEM

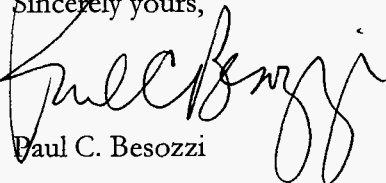
Marlene H. Dortch
Secretary
Federal Communications Commission
445 12th Street, S.W.
Washington, D.C. 20554

Re: EB Docket No. 06-36 – T-NETIX, Inc./T-NETIX Telecommunications Services, Inc.

Dear Ms. Dortch:

In accordance with FCC Public Notice, DA 06-36, released February 2, 2006, enclosed is the compliance filing of T-NETIX, Inc./T-NETIX Telecommunications Services, Inc.

Sincerely yours,

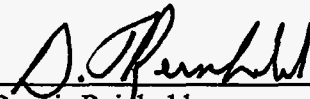


Paul C. Besozzi

cc: Linda Nelson

CERTIFICATE

I, Dennis Reinhold, an officer of T-NETIX, Inc., which in turn controls T-NETIX Telecommunications Services, Inc. (collectively "T-NETIX"), certify as agent for T-NETIX that I have personal knowledge that T-NETIX has established operating procedures that are reflected on Attachment 1 hereto, which procedures I believe are adequate to ensure compliance by Evercom with the applicable rules of the Federal Communications Commission contained in Part 64, Subpart U of Title 47 of the Code of Federal Regulations relating to the handling of Customer Proprietary Network Information ("FCC CPNI Rules").



Dennis Reinhold
Vice President & General Counsel
T-NETIX, Inc.
February 6, 2006

Attachment 1

T-NETIX, Inc. and its subsidiary T-NETIX Telecommunications Services, Inc. (collectively "T-NETIX" or the "Company") offers telecommunications services to inmates at confinement facilities, including the ability for inmates to complete interstate and international prepaid and collect calls ("inmate calling services"), pursuant to contracts that the Company enters with the administrators of the individual facility.

To the extent that T-NETIX collects any customer proprietary network information ("CPNI") in providing such services, the Company has internal policies in place to ensure the security of the data, including its retention in secure password-protected files and other network access security measures. Employees understand the requirements to keep such information confidential.

Any such information is not sold, rented or otherwise made available to third parties, except to the extent permitted by applicable law and regulation (e.g., 47 U.S.C. 222(d)), including to ensure that inmates do not make fraudulent, abusive or illegal use of telecommunications privileges afforded by the confinement facility administrators.

Evercom does not make CPNI available to its sales personnel and does not use, disclose or permit access to CPNI for internal marketing purposes (i.e., for the marketing among classes of services). In light of the limited, foregoing nature of T-NETIX's telecommunications services, Evercom does not maintain either an "opt-in" or "opt-out" system with respect to CPNI.

T-NETIX's Vice President, Dennis Reinhold, understands that the FCC CPNI Rules govern T-NETIX's use and control of any CPNI that the Company may obtain. Mr. Reinhold is the certifying officer of T-NETIX for CPNI purposes. Mr. Reinhold also is the individual in the

organization responsible for establishing and overseeing procedures to maintain the security of any CPNI collected by T-NETIX in the course of providing inmate calling services.

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